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September 12, 2023

Honorable Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

***Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales
Practices and Products Liability Litigation
Case No.: 3:16-md-02738-MAS-RLS***

Dear Judge Shipp and Judge Singh:

The Plaintiffs' Steering Committee (PSC) writes in response to Ms. Sharko's letter, dated September 10, 2023, regarding the PSC's request to have an *ex parte* discussion with the Court regarding positions on settlement. Ms. Sharko's letter is an example of why we believe an *ex parte* meeting would be beneficial. The parties have differing views that should not be part of a writing campaign.

We respectfully request that the Court consider our recommendation that *ex parte* meetings be permitted so that the parties can effectively outline their respective positions to the Court.

Hon. Michael A. Shipp, U.S.D.J.
Hon. Rukhsanah L. Singh, U.S.M.
September 12, 2023
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Thank you for the Court's consideration.

Respectfully submitted,

/s/ P. Leigh O'Dell

/s/ Michelle A. Parfitt

P. Leigh O'Dell

Michelle A. Parfitt

cc: Hon. Joel Schneider, U.S.M.J. (ret.) (via email)
Susan Sharko, Esq. (via email)
All Counsel (via ECF)